

COLORADO TIMBER INDUSTRY ASSOCIATION

P.O. Box 5069 Woodland Park, CO 80866-5069 719-687-0587

December 27, 2017

Mr. Dan Dallas
Rio Grande National Forest
1803 W. Highway 160
Monte Vista, CO 81144

Dear Mr. Dallas:

On behalf of the loggers, mill workers, truckers, and foresters who are members of the Colorado Timber Industry Association (CTIA), we wish to support the Intermountain Forest Association (IFA) comment letter on the Draft Rio Grande NF Revised Land Management Plan (Plan) and Draft Environmental Impact Statement (DEIS) in its entirety, as well as the Species of Conservation Concern spreadsheet attachment. In addition, we would like to emphasize the following:

Collaboration/Public Involvement

Since 1978, CTIA has been the collective voice for Colorado's forest-based businesses and working with IFA, has worked hard to collaborate with all parties to build the timber program across the state. We feel strongly that working together helps generate a better result and we have seen first hand the benefits of collaboration. For instance, CTIA holds logger education classes annually to help loggers and other forest workers increase their knowledge about BMPs and other forestry topics. CTIA also participates with the Colorado State Forest Service BMP audits that take place every two years. In terms of the plan revision process, we feel the collaborative public involvement process fell short in terms of opportunity for meaningful participation. This is concerning and we hope that a more collaborative approach will be used before finalizing the Plan.

Recommended Alternative

Of the three new alternatives, we feel that Alternative C is the overall best choice in terms of actively managing the forest, protecting local jobs, and ensuring there is a forest in the future. Alternative C proposes to salvage the most volume during the first decade, as well as treat the most acres in the second decade. Alternative C also proposes zero acres of new wilderness, shows the greatest movement toward achieving desired conditions, has the greatest positive economic impact, and has the highest number of associated jobs. Thus, we recommend Alternative C as the proposed action.

That being said, as an organization that has worked tirelessly to increase the timber target for the RGNF, and with the FY 18 target being 90,000 ccf, we recommend updating Alternative C to show up to 90,000 ccf of salvage for at least the first three years, and possibility up to 5 years if the mortality continues to spread. We recognize that the volume per year will taper off once the salvage work has been completed.

Plan Components

In terms of the draft Plan, we are very concerned about the lack of specificity within the Plan Components, especially Desired Conditions and Objectives. Most of the Desired Conditions are vague and lack the details necessary to understand how the plan will be implemented into the future and what the results will be long term. As an organization who represents businesses that rely on the RGNF for resources, we need the certainty that is provided with specific Desired Conditions and Objectives. We recommend revising all of the Plan Components to meet the definitions as specified in the 2012 Planning Rule.

Future Timber Harvest/ Cumulative Operation Restrictions

CTIA and IFA have several members who either do work on the RGNF or rely significantly on resources from the RGNF to sustain their wood product businesses. As written, Alternative B proposes to treat considerably less volume than Alternative C in both the first and second decade, which will likely cause a wood shortage for those existing businesses. Furthermore, as written, many of the Desired Conditions, Objectives, and Management Approaches will likely further reduce the amount of treatment acres that can be implemented. For instance, many of CTIA's members need to have the flexibility to work year-round and some of the newly proposed Management Approaches put several timing restrictions in place on the various operating seasons. With many of the timber sales already being on the verge of economic infeasibility, we are concerned that additional requirements that are above and beyond existing standards will further reduce sale viability. We recommend removing any additional requirements that are not required by law.

Effects Analysis/ Bias

Finally, after carefully reviewing the draft Plan and DEIS, we are very concerned with the apparent bias that can be found throughout both documents. For example, we find the following cultural statement to be very derogatory toward our members – “under Alternative C, if larger and expedited timber harvest is expected, negative effects on cultural resources could include increased artifact collection by contractors.” Another example can be found in the “Effects on Wetlands and Fens from Management of Other Resources” section where it states, “consequently, alternative C would likely have the greatest impacts to riparian and wetland ecosystems.” At no point in this section does it mention the use of BMPs or the fact that design criteria typically precludes harvesting or road building within wetland areas or fens. This bias is unprofessional and not a productive way to highlight the differences between alternatives. We expect that a good effects analysis would present both sides of every action, including benefits that come from specific actions and the mitigation actions that prevent effects.

Thank you for your consideration. We would welcome the opportunity to work with you, your staff, and other stakeholders on the details of the revised Plan.

Sincerely,

Dan Casey

Dan Casey
CTIA President